

wherein said memory device stores instructions that, when executed by said processor, cause said processor to:

③  
① dynamically create a plurality of data field conversion routines for each set of input attributes and output attributes, the conversion routines including one or more computer instructions to be executed during conversion; and

store said plurality of data field conversion routines in a second memory device accessible to said application program.

### REMARKS

Reconsideration of the application is respectfully requested. In the Office Action, Claims 1-20 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 6,202,072 ("Kiwahara"). Kiwahara appears to disclose a method and apparatus for processing SGML and converting between SGML file and plain text file. In converting the files, Kiwahara appears to disclose - 1) identifying a field and correlating the field to a SGML tag using a prototype document, and 2) generating a correlation table correspondence to a specific prototype document (Col 2).

The Office Action admits that "Kuwahara fails to explicitly teach (b) generating at runtime a first optimized conversion routine." and then erroneously concludes that Kiwahara's SGML conversion form file (conversion table as shown in Figure 7) renders the creating at runtime a first optimized conversion routine obvious. Applicant's respectfully traverse this conclusion, and submit that Kiwahara's conversion table does not teach or suggest generating a conversion routine that includes "one or more lines of computer instructions to be executed during conversion" as claimed in independent claims 1, 8, and 15. Creating conversion routines is not obvious over Kiwahara's correlation table.

The criterion for determination of obviousness is whether the prior art would have suggested to one of ordinary skill in the art that the claimed invention should be carried out and would have a reasonable likelihood of success. The mere fact that the prior art may be modified in the manner suggested in the Office Action does not make the modification obvious unless the prior art suggested the desirability of the

modification. Kiwahara fails to suggest any motivation for, or desirability of, the changes espoused in the Office Action. Accordingly, it is submitted that the claims in the present application are not obvious over Kiwahara.

This communication is believed to be fully responsive to the Office Action and every effort has been made to place the application in condition for allowance. The claims, in view of the foregoing explanation, are believed to be patentable over the prior art, and a favorable Office Action is hereby earnestly solicited.

If a telephone interview would be of assistance in advancing prosecution of the subject application, Examiner is requested to telephone the number provided below.

Respectfully submitted,

Date: December 31, 2001

By: Eunhee Park

Eunhee Park  
Registration No. 42,976  
Baker & McKenzie  
805 Third Avenue  
New York, NY 10022  
Telephone (212) 751-5700  
Facsimile (212) 759-9133

**VERSION WITH CHANGES MARKED-UP**

1. (Twice Amended) A method of converting a plurality of input field types to a plurality of output field types by an application program, said method comprising:

(a) receiving a first attribute of a first input field type and a second attribute of a first output field type;

(b) creating a first optimized conversion routine based on said first attribute and said second attribute, the conversion routine including one or more computer instructions to be executed during conversion; and

(c) executing said first optimized conversion routine from said application program to convert said first input field type to said first output field type.

8. (Twice Amended) A method of converting data from input field types to output field types, said method comprising:

(a) receiving a plurality of input attributes and output attributes from an application program;

(b) dynamically creating a plurality of data field conversion routines for each set of input attributes and output attributes, the conversion routines including one or more computer instructions to be executed during conversion; and

(c) storing said plurality of data field conversion routines in memory accessible to said application program.

15. (Twice Amended) A system for dynamically generating computer data field conversion routines, said system comprising:

a processor; and

a memory device coupled to said processor;

wherein said system is adapted to receive a plurality of input attributes and output attributes from an application program; and

wherein said memory device stores instructions that, when executed by said processor, cause said processor to:

dynamically create a plurality of data field conversion routines for each set of input attributes and output attributes, the conversion routines including one or more computer instructions to be executed during conversion; and

store said plurality of data field conversion routines in a second memory device accessible to said application program.